

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION**

SELENA HOWARD, *et al*

PLAINTIFFS

v.

CAUSE NO. 2:19-cv-00084-KS-MTP

FORREST COUNTY, *et al*

DEFENDANTS

**PLAINTIFF SELENA HOWARD’S RESPONSES TO DEFENDANTS FORREST
COUNTY, MISSISSIPPI; CHEY SUMRALL; AND BLAKE BASS’S FIRST SET OF
INTERROGATORIES**

COMES NOW SELENA HOWARD, hereinafter “Howard,” by and through her undersigned counsel, and hereby responds to Forrest County, Mississippi, Chey Sumrall, and Blake Bass’ First Set of Interrogatories Propounded to Selena Howard as follows to wit:

GENERAL OBJECTIONS

1. Plaintiff objects insofar as the Interrogatories seek information or testimony within the scope of the attorney-client privilege or any other applicable privilege or which seek documents or things prepared in anticipation of litigation or trial by or for Plaintiff or his representatives or the mental impressions, conclusions, opinions, or legal theories of Plaintiff’s attorneys or other representatives. Pursuant to Rule 26(b)(5), Plaintiff objects to the disclosure or production of documents and materials generated during the course of this litigation that constitute attorney work product or that represent privileged attorney-client communications. These documents and materials include, but are not limited to, correspondence between counsel and the Plaintiff, correspondence between counsel and consulting experts, and counsel’s notes concerning the investigation or interviews with potential witnesses.

EXHIBIT I

INTERROGATORY NO. 9: Please identify each and every document of which you, your agent, or your attorney is aware that pertains to this action in any way, specifying the nature of the document and the name and address of the person who possesses the original.

RESPONSE: Incident reports, Justice Court documents.

INTERROGATORY NO. 10: Please identify each and every document you intend to introduce into evidence at the trial of this matter as well as those you will utilize for demonstrative purposes.

RESPONSE: Plaintiff has not yet determined what may be used as evidence at the trial of this matter but reserves the right to supplement.

INTERROGATORY NO. 11: Describe in your own words, in detail, how the events of which you complain took place, beginning three (3) hours prior to the accident, and describing particularly your whereabouts and activities. Please do not simply refer to the Complaint.

RESPONSE: Plaintiff was sleeping 3 hours prior to the incident. When she woke up, she, Ms. Antrinett Leggett, and Darious Leggett left the home to take Ms. Howards sister to her GED class at Pearl River Community College. On the way back home, they passed two sheriff cars and then were followed down their driveway. Once they returned home, Selena Howard was in the kitchen cooking breakfast with Plaintiff Antrinett Leggett when Blake Bass and Chey Sumrall pulled up at the house. Plaintiff Darious Leggett addressed the officers, asking why they were at the house, but nobody gave him an answer. Officer Blake Bass looked towards Antrinett and made a comment that he “should have arrested her for the

stunt she pulled in the car.” The officers then told all three Plaintiffs they were there to check on the well-being on the dogs. The officers demanded the dogs be taken off of their chains. Darious complied and unleashed the dogs. The officers were cussing at Darious as he was unleashing the dogs and then stated there was no food in the food bowls. Darious explained that was because the dogs had already eaten their food that morning. Darious offered to show the officers the container of dog food they keep in the house. When the officers tried to enter the house, Darious stated that he knew his rights and was not letting them in their home. Officer Chey Sumrall was trying to provoke Darious. When the officers tried to arrest Darious, Ms. Antrinett began calling her mother to ask for help. Antrinett tried to get between Darious and the officers – begging them to stop and calm down – when she was pushed to the ground and officer Blake Bass put his knee in her back and took her phone away from her. Plaintiff Selena Howard called 911 to try to get back up officers dispatched to their house in an attempt to stop the abuse that was taking place. Officer Chey Sumrall placed Antrinett Leggett in the backseat of his cop car. Officer Blake Bass had his tazer pointed towards Darious Leggett’s genital area and then tazed him. When backup officers did show up to the scene, Selena Howard was told there was nothing they could do about the situation since they were not there to witness the incident. Darious Leggett was taken to the hospital in an ambulance and Antrinett Leggett was taken to jail.

INTERROGATORY NO. 12: Please state the names, addresses, and telephone numbers of each and every person, corporation, or other entity, including, but not limited to, Medicaid, Medicare, Champus, and insurers which paid any bills or expenses, including, but not

DANIEL M. WAIDE (MSB #103543)

Daniel M. Waide, (MSB#103543)
Johnson, Ratliff & Waide, PLLC
1300 HARDY ST.
PO BOX 17738
HATTIESBURG, MS 39404
601-582-4553 (OFFICE)
601-582-4556 (FAX)
dwaide@jhrlaw.net

CERTIFICATE OF SERVICE

I, Daniel M. Waide, attorney for Plaintiff, do hereby certify that I have this day delivered, by electronic means, a true and correct copy of the above and foregoing to the following:

William R. Allen
Jessica S. Malone
Allen, Allen, Breeland & Allen, PLLC
wallen@aabalegal.com
jmalone@aabalegal.com

THIS the 10 day of March, 2020.

By: 
DANIEL M. WAIDE, MSB #103543

Daniel M. Waide, (MSB#103543)
1300 HARDY ST.
PO BOX 17738
HATTIESBURG, MS 39404
601-582-4553 (OFFICE)
601-582-4556 (FAX)
dwaide@jhrlaw.net

VERIFICATION OF DISCOVERY RESPONSES

STATE OF MISSISSIPPI
COUNTY OF FORREST

I, SELENA HOWARD being first duly sworn, on oath, depose and say that I am the Plaintiff herein, and that I have read the within and foregoing Plaintiff Selena Howard's Responses to Defendants Forrest County, Mississippi; Chey Sumrall; and Blake Bass's First Set of Interrogatories, know the contents thereof, and believe the same to be true.

Selena Howard

SELENA HOWARD, Plaintiff

PERSONALLY came and appeared before me, the undersigned authority in and for the jurisdiction aforesaid, the within named SELENA HOWARD, who after being by me first duly and properly sworn, states on their oath that the matters, things, and allegations set forth in the above and foregoing Plaintiff Selena Howard's Responses to Defendants Forrest County, Mississippi; Chey Sumrall; and Blake Bass's First Set of Interrogatories.

SWORN TO AND SUBSCRIBED by me on this the 9th day of MARCH, 2020.

Paula Harrison
NOTARY PUBLIC

MY COMMISSION EXPIRES:

June 2, 2023

